

EXHIBIT 2

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Attorneys for Plaintiff MARK SNOOKAL

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MARK SNOOKAL, an individual,)	CASE NO.: 2:23-cv-6302-HDV-AJR
)	
)	
Plaintiff,)	PLAINTIFF MARK SNOOKAL'S
)	REQUEST FOR PRODUCTION OF
)	DOCUMENTS TO DEFENDANT
vs.)	CHEVRON USA. INC., SET ONE
)	
)	
CHEVRON USA, INC., a California)	
Corporation, and DOES 1 through)	
10, inclusive,)	
)	
)	
)	
Defendants.)	
)	
)	

REQUEST FOR PRODUCTION NO. 10:

All documents about or concerning **YOUR** decision to deem Plaintiff “not fit for duty” for the Reliability Engineering Manager position in Escravos, Nigeria.

REQUEST FOR PRODUCTION NO. 11:

All documents reflecting any communications between **YOU** and any of Plaintiff’s medical providers, from January 1, 2019 to January 1, 2022.

REQUEST FOR PRODUCTION NO. 12:

All documents reflecting complaints made by Plaintiff to **YOU**, including without limitation, disability discrimination complaints to the Chevron Ombudsman and Chevron’s Human Resources, from January 1, 2019 to January 1, 2022.

REQUEST FOR PRODUCTION NO. 13:

Any and all communications about or concerning Plaintiff’s complaints to **YOU**, from January 1, 2019 to January 1, 2022. Plaintiff’s complaints to **YOU** include without limitation, disability discrimination complaints to the Chevron Ombudsman and Chevron’s Human Resources.

REQUEST FOR PRODUCTION NO. 14:

Any and all documents reflecting **YOUR** alleged efforts to investigate any of Plaintiff’s complaints of discrimination and/or failure to accommodate a disability, including any of **YOUR** investigative files relating to same.

REQUEST FOR PRODUCTION NO. 15:

Any and all documents **YOU** relied upon in making hiring decisions for the job positions identified in Paragraph 29 of the Complaint.

REQUEST FOR PRODUCTION NO. 16:

Any and all communications regarding hiring decisions for the job positions described in Paragraph 29 of the Complaint.

REQUEST FOR PRODUCTION NO. 17:

Any and all documents evincing the job duties, pay grade, organizational

1 structure, promotional opportunities for the Reliability Change Operating Assistant
2 as identified in Paragraph 31 of the Complaint.

3 **REQUEST FOR PRODUCTION NO. 18:**

4 Any and all communications about or concerning the creation of the
5 Reliability Change Operating Assistant position for Plaintiff.

6 **REQUEST FOR PRODUCTION NO. 19:**

7 Any and all communications by Dr. Eshiole Asekomeh about or concerning
8 Plaintiff.

9 **REQUEST FOR PRODUCTION NO. 20:**

10 Any and all communications by Dr. Scott Levy about or concerning
11 Plaintiff.

12 **REQUEST FOR PRODUCTION NO. 21:**

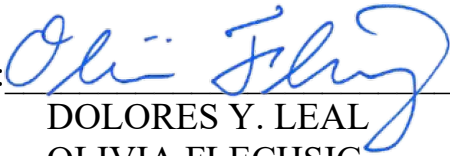
13 Any and all communications by anyone in Chevron's Human Resources
14 Department about or concerning Plaintiff from January 1, 2019 to January 1, 2022.

15 **REQUEST FOR PRODUCTION NO. 22:**

16 Any and all documents reflecting Chevron's Medical Suitability for Expat
17 Assignment ("MSEA") policies in effect in California in 2019.

18
19
20 DATED: May 7, 2024

ALLRED, MAROKO & GOLDBERG

21
22 By: 
23 DOLORES Y. LEAL
24 OLIVIA FLECHSIG
25 Attorneys for Plaintiff,
26 MARK SNOOKAL
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 6300 Wilshire Boulevard, Suite 1500, Los Angeles, California 90048.

On **May 7, 2024** I served the foregoing document described as **PLAINTIFF MARK SNOOKAL'S REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT CHEVRON USA, INC., SET ONE** on interested parties in this action:

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[X] BY ELECTRONIC SERVICE: Pursuant to the Parties' agreement to accept service electronically, I caused such document to be electronically served via email to the email addresses of the addressee(s).

Executed on **May 7, 2024** at Los Angeles, California.

[X] Federal I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.


ANGIE O. PAZ